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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

JOHN ILIESCU, JR, and SONNIA ILIESCU,  
Trustees of The John Iliescu, Jr. and Sonnia  
Iliescu 1992 Family Trust Agreement, dated  
January 24, 1992,

Plaintiffs,

vs.

THE REGIONAL TRANSPORTATION  
COMMISSION OF WASHOE COUNTY, a  
special unit of the government; and DOES I  
through X, inclusive,

Defendants.

Case No. 3:21-CV-000387-ART-CLB

**ILIESCU'S DISCLOSURES  
PURSUANT TO FRCP 26(a)(3)**

Plaintiffs, JOHN ILIESCU, JR. and SONNIA ILIESCU, Trustees of The John Iliescu, Jr. and Sonnia Iliescu 1992 Family Trust under Agreement, dated January 24, 1992 (collectively "ILIESCU"), by and through their attorneys Maupin, Cox & LeGoy, discloses the following documents and witnesses known to Plaintiffs as of this date pursuant to FRCP 26.

**A. LIST OF WITNESSES PURSUANT TO FRCP 26(a)(3):**

**a. Witnesses ILIESCU expects to present:**

**i. John Iliescu, Jr.**

- ii. Sonnia Iliescu
- iii. Anthony J. Wren
- iv. Steve N. Bell
- v. Mayor Hillary Schieve
- vi. PMK, Regional Transportation Commission of Washoe County
- vii. Jeffrey Wilbrecht, Project Manager, Regional Transportation Commission of Washoe County
- viii. Pamela Samms, Paragon Engineering
- ix. PMK, Paragon Engineering

**b. Witnesses Iliescu may call if the need arises:**

- i. Witnesses identified by any party in their Pretrial Disclosures;
- ii. Witnesses identified by any party pursuant to FRCP 26; and
- iii. Any witness deposed by any party.

**c. Witnesses whose testimony is expected to be presented by means of deposition: None at this time.**

**B. LIST OF DOCUMENTS PURSUANT TO FRCP 26(a)(3)(C):**

**a. Documents ILIESCU expects to offer:**

| DESCRIPTION  | BATES LABEL DESIGNATIONS      |
|--|-------------------------------|
| Appraisal of APN 014-063-07, Dated March 23, 2020, Prepared by Anthony J. Wren, MAI, SRA and Mr. Wren's CV   | ILIESCU0000001-ILLIESCU000114 |
| Appraisal of APN 014-063-11, Dated March 23, 2020, Prepared by Anthony J. Wren, MAI, SRA and Mr. Wren's CV   | ILLIESCU000115-ILIESCU000212  |
| Appraisal of APN 014-063-07, Dated October 19, 2020, Prepared by Anthony J. Wren, MAI, SRA and Mr. Wren's CV | ILIESCU000213-ILIESCU000332   |
| Appraisal of APN 014-063-11, Dated October 19, 2020, Prepared by Anthony J. Wren, MAI, SRA and Mr. Wren's CV | ILIESCU000333-ILIESCU000437   |
| Assessor's Map Number 014-06, Created by TWT 10/14/203   | ILIESCU000438                 |
| Access Aerial View   | ILIESCU000439                 |
| Photos of Subject Property   | ILIESCU000440-ILIESCU000447   |



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|----|---|---------------------------------|
| 1  | Photos, Standing Water at Drain   | ILIESCU000448-<br>ILIESCU000449 |
| 2  | Johnson Group Broker Price Option for 999 S. Virginia Street  | ILIESCU000450-                  |
| 3  | and 961 S. Virginia Street, Prepared by Richard K. Johnson,<br>Broker/Owner, on June 15, 2019, and Mr. Johnson's CV         | ILIESCU000469                   |
| 4  | A Review of an Appraisal Prepared by Scott Q. Griffin, MAI,<br>with a Date-of-Value as of October 31, 2018, for a Permanent | ILIESCU000470-                  |
| 5  | Easement and Two Temporary Construction Easements,<br>Located at 961 & 999 South Virginia Street, Reno, Washoe              | ILIESCU000480                   |
| 6  | County, Nevada, APN 014-063-07 & 11, Prepared by William<br>G. Kimmel, Certified General Appraiser, and Mr. Kimmel's        |                                 |
| 7  | CV  |                                 |
| 8  | Interlocal Cooperative Agreement Approving RTC Program of<br>Projects, Dated May 24, 2016                                   | ILIESCU000481-<br>ILIESCU000488 |
| 9  | An Appraisal of a Permanent Easement and Two Temporary<br>Construction Easements, Located at 961 & 999 South Virginia       | ILIESCU000489-                  |
| 10 | Street, Reno, Nevada (Washoe County A.P.N's 014-063-07<br>& 11), Prepared for Woodburn and Wedge, Re: Virginia Street       | ILIESCU000621                   |
| 11 | Bus Rapid Transit Extension Project, RTC Project No.<br>211003, as of April 8, 2019   |                                 |
| 12 | Proposed Permanent Easement Legal Description, APN: 014-<br>063-11 and 014-063-07   | ILIESCU000622-<br>ILIESCU000629 |
| 13 | RTC Resolution of Condemnation, Approved February 15,<br>2019   | ILIESCU000630-<br>ILIESCU000643 |
| 14 | RTC Notice of Public Meeting – RTC Board Meeting, Dated<br>January 22, 2019   | ILIESCU000644                   |
| 15 | Demonstrative Photo of Subject Property (View from Across<br>Virginia St.)  | ILIESCU000645                   |
| 16 | Demonstrative Photo of Subject Property, View from Top of<br>Roundabout on Virginia St.                                     | ILIESCU000646                   |
| 17 | Photo of Subject Property (Prior to Construction)   | ILIESCU000647                   |
| 18 | Photo of Subject Property (Alleyway Access)   | ILIESCU000648                   |
| 19 | Photo of Subject Property (Alleyway Access, Aerial View)  | ILIESCU000649                   |
| 20 | Photo of Subject Property (Aerial View)   | ILIESCU000650                   |
| 21 | Photo of Subject Property (Pre-Construction)  | ILIESCU000651                   |
| 22 | Photo of Subject Property (Bus in Roundabout)   | ILIESCU000652                   |
| 23 | Photo of Subject Property (Drain)   | ILIESCU000653                   |
| 24 | Photo of Subject Property (Original Driveway)   | ILIESCU000654                   |
| 25 | Photo of Subject Property (Original Street Ingress-Egress)  | ILIESCU000655                   |
| 26 | Photo of Subject Property (Post-Construction)   | ILIESCU000656                   |
|    | Photo of Subject Property (Post-Construction Alleyway View)   | ILIESCU000657                   |
|    | Photo of Subject Property (Post-Construction Virginia Street<br>View)   | ILIESCU000658                   |
|    | Photo of Subject Property (Post-Construction Depressed Area)  | ILIESCU000659                   |
|    | Photo of Subject Property (Virginia Street Median)  | ILIESCU000660                   |



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|----|---|----------------------------------|
| 1  | Photo of Wells Avenue Roundabout (Aerial View)  | ILIESCU000661                    |
| 2  | Photo of Wells Avenue Roundabout (Aerial View)  | ILIESCU000662                    |
| 3  | Photo of Wells Avenue Roundabout (Street View, Ingress/Egress Driveway)   | ILIESCU000663                    |
| 4  | Photo of Wells Avenue Roundabout (Aerial View, Private Access)  | ILIESCU000664                    |
| 5  | Photo of Wells Avenue Roundabout (Aerial View, Private Access, Limited Parking)   | ILIESCU000665                    |
| 6  | 955 S. Virginia Street Sales Information  | ILIESCU000666                    |
| 7  | Email Dated October 30, 2018 from Sonnia Iliescu to Sarah Fye, MBA, Appraiser Interim, Johnson Perkins Griffin, LLC, Re: 961 & 999 South Virginia Street  | ILIESCU000667-<br>ILIESCU000668  |
| 8  | Letter Dated December 4, 2018 to John Jr. & Sonnia Iliescu Family Trust from Pamela Samms, Paragon Partners, Ltd., Re: Letter Presenting Written Offer, Virginia Street BRT Extension Project                       | ILIESCU000669                    |
| 10 | Email Dated January 16, 2019 to Sonnia Iliescu from Lee Pemberton, Paragon Partners, Ltd., Re: Virginia Street Bus Rapid Transit Project  | ILIESCU000670                    |
| 12 | Email, n.d., to Pamela Samms from Lee Pemberton, Paragon Partners, Ltd., Re: Virginia Street BRT Extension Project  | ILIESCU000671-<br>ILIESCU000672  |
| 13 | Letter Dated September 24, 202 to Dr. John Iliescu, Jr., and Sonnia Iliescu from Agenisz Samadhi, Nevada Title & Payday Loans Service, Inc., Re: 961 South Virginia Street  | ILIESCU000673                    |
| 15 | Letter Dated January 28, 2021 to Dr. John Iliescu, Jr., and Sonnia Iliescu from Agenisz Samadhi, Nevada Title & Payday Loans Service, Inc., Re: 961 South Virginia Street   | ILIESCU000674                    |
| 17 | Letter Dated December 13, 2021 to Dr. John Iliescu, Jr., and Sonnia Iliescu from Natalie Hill, Nevada Title & Payday Loans Service, Inc., Re: Non-Renewal Notice, for Property Located at 961 South Virginia Street | ILIESCU000675                    |
| 19 | Letter Dated December 30, 2021 to Natalie Hill, Nevada Title & Payday Loans Service, Inc., Re: Final Termination of Lease – 961 S. Virginia Street  | ILIESCU000676                    |
| 21 | Lease Extension Dated January 21, 2022, Between John Iliescu, Jr. and Sonnia Iliescu, and Nevada Title & Payday Loans Service, Inc., Re: 961 South Virginia Street  | ILIESCU000677-<br>ILIESCU 000678 |
| 23 | Letter Dated July 2, 2018 to John, Jr. and Sonnia Iliescu Family Trust from RTC, Re: Notice to Owner, Virginia Street BRT Extension Project   | ILIESCU000679                    |
| 24 | Letter Dated January 22, 2019 to John, Jr. and Sonnia Iliescu Family Trust from RTC, Re: Notice Letter Pursuant to NRS 241.034  | ILIESCU000680                    |
| 26 | Interlocal Cooperative Agreement Approving RTC Program of Projects, Dated May 24, 2016  | ILIESCU000681-<br>ILIESCU 000688 |

|   |                             |
|---|-----------------------------|
| Offering Memorandum, Re: 1064 S. Virginia, Dated December 17, 2020  | ILIESCU000689-ILIESCU000693 |
| Lease Between John Iliescu, Jr., and Sonnia Iliescu, Trustees of the Iliescu Family Trust, Trustees of the Iliescu Family Trust and Cash Loans of America, Inc., dba Nevada Title Loan, Dated December 1, 1995    | ILIESCU000740-ILIESCU000757 |
| Email from Dane Anderson, Esq. to Dr. Iliescu and Sonnia Iliescu, Dated June 11, 2019   | ILIESCU000758               |
| Site Survey of 969 S. Virginia Street, APN 14-063-07, Dated July 26, 2022, Prepared by Steven N. Bell, Bell Land Surveying  | ILIESCU000759               |
| Photo of Subject Property (Alleyway Access and Roundabout Exit Traffic, Aerial View)  | ILIESCU000760               |
| Survey narrative, Project: 999 South Virginia Street, Reno, NV, APN 14 – 063 – 07, 6,451 Square Feet, Assessed Owner: The John and Sonnia Iliescu 1992 Family Trust, Bell Land Surveying, Dated November 16, 2022 | ILIESCU000761               |
| Steve N. Bell, PLS Resume   | ILIESCU000762               |

**b. Documents ILIESCU may offer if the need arises:**

- iv. Documents identified by any party in their pretrial disclosures;
- v. Documents produced by any party pursuant to FRCP 26;
- vi. Documents produced by any party in response to interrogatories, requests for production, or requests for admission;
- vii. Documents produced by any party as exhibits to dispositive motions;
- viii. Documents produced by any party as exhibits used in depositions;
- ix. Any documents produced by any party in response to third-party subpoenas; and
- x. Any other documents produced by any party.

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1 Dated this 15<sup>th</sup> of July, 2023.

2 MAUPIN, COX & LeGOY

3  
4 By: 

5 Donald A. Lattin, Esq.

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14 *Attorneys for Plaintiffs*



**CERTIFICATE OF SERVICE**

Pursuant to FRCP Rule 5(b), I hereby certify that I am an employee of MAUPIN, COX, & LeGOY, Attorneys at Law, and in such capacity and on the date indicated below, I caused to be served a true and correct copy of the foregoing document via the CMECF filing system, addressed as follows:

Dane W. Anderson, Esq.  
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*Attorney for Defendant*

Dated this 10<sup>th</sup> day of July, 2023.

  
EMPLOYEE